

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
ST. JOSEPH DIVISION**

VetBridge Product Development Subsidiary I	)	
(NM-OMP), LLC,	)	
	)	
Plaintiff,	)	Case No. 5:18-cv-06147-BCW
	)	
vs.	)	
	)	
NewMarket Pharmaceuticals, LLC,	)	
	)	
Defendant.	)	

**MOTION TO WITHDRAW BY STINSON LEONARD STREET LLP**

Pursuant to Local Rule 83.2, the law firm Stinson Leonard Street LLP (“Stinson”) files this Motion to Withdraw as counsel for Defendant NewMarket Pharmaceuticals, LLC (“NewMarket”) in the above-captioned lawsuit.

1. Stinson’s reasons for withdrawal include those set forth in Missouri Rule of Professional Conduct 4-1.16(5) [“the client fails substantially to fulfill an obligation to the lawyer regarding the lawyer’s services and has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled”] and 4-1.16(6) [“the representation will result in an unreasonable financial burden on the lawyer or has been rendered unreasonably difficult by the client”].

2. NewMarket has not fulfilled its obligations to Stinson, and the representation has been rendered unreasonably difficult.

3. Undersigned counsel certifies that on March 19, 2019, Robert Pollaro, NewMarket’s lead counsel in this matter, was notified by Stinson that he and NewMarket are responsible for complying with all orders of the Court and time limitations established by the rules

of procedure or by Court order; and that NewMarket is advised to retain new local counsel in connection with this case.

4. Undersigned counsel is serving this Motion to Withdraw upon NewMarket by certified mail, return receipt requested, as well as by email to Mr. Pollaro.

5. Stinson respectfully requests that this Motion to Withdraw be granted and that it be allowed to withdraw as counsel for NewMarket in this case.

Dated: March 27, 2019

Respectfully submitted,

STINSON LEONARD STREET LLP

/s/ Brett A. Shanks

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ATTORNEY FOR DEFENDANT NEWMARKET  
PHARMACEUTICALS, LLC

**Certificate of Service**

I hereby certify that on this 27th day of March, 2019, the above pleading was filed with the Court via the CM/ECF system, which served electronic notification of such filing to all attorneys of record in this action pursuant to Fed. R. Civ. P. 5(b)(2)(D) and Local Rule 5.1.

/s/ Brett A. Shanks

Brett A. Shanks

Attorney for Defendant